Umetco Minerals Corporation



PO BOX 66 137 47th STREET • NIAGARA FALLS, NEW YORK 14302

July 31, 1986

Dr. F. J. Bradley Principal Radiophysicist New York State Department of Labor Division of Safety and Health Radiological Health Unit One Main Street - Room 813 Brooklyn, NY 11201

Subject: Umetco Mineral Corporation

Niagara Falls, NY

Dear Dr. Bradley:

Low level radioactive vanadium bearing slag and ilmenite referred to in my letter to you of May 15, 1986 has been disposed of at the SCA Hazardous Waste Disposal Site. A copy of the Waste Manifest form and the approved invoices are enclosed

Very truly yours,

mau/ Enclosures

cc: Messrs:

J. F. Frost T. J. Kagetsu

R. F. Kelly

F. V. McMillen

D. G. Millenbruch

Umetco Minerals Corporation



PO BOX 579 4625 ROYAL AVENUE • NIAGARA FALLS NEW YORK 14302

May 15, 1986

Dr. F. J. Bradley Principle Radiophysicist New York State Department of Labor Room 813 One Main Street Brooklyn, NY 11202

Subject: Umetco Minerals Corporation, Niagara Falls, NY

Dear Dr. Bradley:

In our phone conversation of Tuesday, May 13 we discussed disposal of two low level radioactive materials that were discovered in a radiation survey of the Umetco property in Niagara Falls, NY. The first was illmenite sand (an iron titanium ore) that had been used to backfill a 10' x 10' concrete pit. The second was an isolated quantity of slag (calcium-aluminum oxide) from the furnacing of ferrovanadium. The illmenite sand was removed from the pit and currently is contained in 125 (one hundred twenty-five) 55-gallon drums. I would estimate total weight at approximately 40 to 50 tons. The slag is in lumps in a pile that I would estimate to contain 50 to 75 tons. Analyses of the materials are presented in the following Table 1.

TABLE 1

Radiochemical Analyses of Samples From the Niagara Plant

	Analyses					
	URANIUM SERIES			THORIUM SERIES		
Description	Uranium	Th-230	Ra-226	Th-232	Th-228	
	μg/g	pC1/g	pC1/g	pCi/g	pC1/q	
Illmenite Sand - Top of Pit	28.9	12±2	19±2	16±2	17±2	
Illmenite Sand - 7' in Pit	44.3	22±2	31±3	37±2	39±3	
Dark Slag-Yard East of Fce. Bldg.	20.2	299±7	4.4±1.1	16±2	4±9	
Light Slag-Yard East of Fce. Bldg	. 18.6	466±9	7.0±1.4	3 7±3	14±2	

Industrial Code Rule 38, Table 5 "Limits for Uncontrolled Areas" limits source material to 0.05 percent by weight (500 $\mu g/g$ or 500 ppm). For Thorium 232 this converts to 55 pCi/g. The concentrations of Th-232 reported in picocurries in Table 1 were converted to $\mu g/g$ and added to the weight of Lanium to determine the total source material present. This is shown in Table 2.

The gamma radiation measured at the surface during excavation of the pit and within the slag pile is also reported in Table 2.

TABLE 2 Weight of Source Material

Sample	Uranium <u>ug/g</u>	Th-232 <u>µg/g</u>	Total Source Material ug/g	Gamma Radiation _μR/hr*
Illmenite-Top of Pile	28.9	145.5	174.4	170
Illmenite-7' In Pit	44.3	336.4	380.7	150
Dark Slag	20.2	145.5	165.7	150
Light Slag	18.6	336.4	355.0	20 0

*Ludlum Model 19 Micro R Meter - Reading at Surface

As we discussed the total source material in both materials is less than 500 µg/g, the limit for uncontrolled areas and the radiation is less than 250 μR , the limit for fixed surface contamination.

Although technically the material was not sufficiently radioactive to be controlled you convinced me that it was not a good idea to use it to fill a low area in the yard. If this were done then a rider would have to be appended to the lease that would restrict future building. Since this is not an attractive option I propose to dispose of both the slag and illmenite in a local hazardous waste repository.

Unless I misunderstood, you did not voice an objection to this during our phone conversation. Therefore, I plan to immediately begin the paper work to initiate this course of action. However I will not remove anything from the property before June to allow you time to reconsider. I will not expect to hear from you unless you disapprove.

I enjoyed talking to you on Monday and I want to thank you again for the assistance you provided

Sincerely

D. J. Hanser Assistant Director - Technology

cc: Messrs:

R. F. Kelly R. G. Beverly

F. V. McMillen

Blind Copies: Messrs:

J. F. Frost T. J. Kagetsu

D. G. Millenbruch

R. L. Miller W. D. Smith

C. T. Wentzel



HAZARDOUS WASTE MANIFEST

PO Box 12820, Albany, New York 12212

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HAZARDOUS WASTE MANIFEST

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HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212

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CHEI-ICAL WASTE HANAGENEIT, INC. TECHNICAL SERVICE P.O. Box 200 Model City, New York 14107

net 30 days

ALL PAST DUE AMOUNTS WILL BEAR IN TEREST AT TWO PERCENT PER MONTH OF THE MAXIMUM RATE ALLOWED BY LAW WHICHEVER IS LESS

CUSTOMER ACCOUNT NUMBER

Ref. Cont. #250-07117
INVOICE NUMBER INVOICE DATE PAGE

00556 6/20/86

Umetco Minerals Corporation Accounting Department P.O. Box 1029 Grand Junction, Colorado 81502

Disposal of 75.69 tons of vanadium slag removed from the Umetco site located at 137 47th St., Niagara Falls, NY on June 12, 1986

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JUN 2 6 1986

Mr - 5 8%

REMIT TO ADDRESS

P.O. Box 8000 Dept. 660 Buffalo. NY 1426/ PLEASE PAY THIS AMOUNT

113,548.00

(PLEASE RETURN THIS COPY WITH YOUR REMITTANCE)



SCA Chemical Services. Inc Model City Facility P O Box 200 1550 Balmer Road Model City, New York 14107 716/754-8231

June 20, 1986

UMETCO MINERALS CORPORATION

Accounting Department P.O. Box 1029 Grand Junction, Colorado 81502

Reference Cont.: #250-07117

Chemical Waste Management wishes to submit an invoice of \$13,548.00 for the disposal of 75.69 tons of vanadium slag removed from the Umetco site located at 137 47th Street, Niagara Falls, New York, on June 18, 1986.

Attached please find three weight tickets verifying the tonnage of slag disposal at SCA/Chemical Waste Management, Model City, New York.

Sincerely,

SCA CHEMICAL SERVICES, INC. MODEL CITY FACILITY

Gary Shirley

Technical Service Manager

1 12 Ys

GS:sls



CHEMICAL WASTE MANAGEMENT, INC TECHNICAL SERVICE P O Box 200 Model City, New York 14107

net 30 days

ALL PAST DUE AMOUNTS WILL BEAR IN TEREST AT TWO PERCENT PER MONTH OF THE MAXIMUM RATE ALLOWED BY LAW WHICHEVER IS LESS

CUSTOME	R ACCOUNT NUMBER	}
P.O. #25	0-07117	
INVOICE NUMBER	INVOICE DATE	PAGE
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Umetco Minerals Corporation Accounting Department P.O. Box 1029 Grand Junction, Colorado 81502

Disposal of 125 drums of Illmenite removed from Umetco site located at 137 47th Street, Niagara Falls, New York on 6/19/86 and 6/20/86

JUL 1 1686

REMIT TO ADDRESS

P 3 Box 8000 Dept 660 Buffalo, New York 14267 PLEASE PAY THIS AMOUNT

\$14,200

(PLEASE RETURN THIS COPY WITH YOUR REMITTANCE)



SCA Chemical Services. Inc. Model City Facility P O Box 200 1550 Balmer Road Model City, New York 14107 716/754-8231

June 30, 1986

Umetco Minerals Corporation Accounting Department P.O. Box 1029 Grand Junction, Colorado 81502

Dear Sir:

Chemical Waste Management wishes to submit an invoice of \$14,200.00 against P.O.#250-07117 for the disposal of 125 drums of Illmenite, (Hazardous Waste Chemical), removed from the Umetco site located at 137 47th Street, Niagara Falls, New York, on 6/19/86 and 6/20/86.

Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

SCA CHEMICAL SERVICES, INC.

MODEL CITY FACILITY

Garv Shirlev

Technical Service Manager

GS:sls